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April 6, 2020

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Centre Street  
New York, NY 10007

Re: United States v. Marcos Mendez-Feliz  
15 CR 473 (JMF)

Dear Judge Furman:

This letter is submitted in support of the Defendant Mendez-Feliz's application for an adjournment of the trial, currently set for July 20, 2020, to a date in December 2020 or thereafter. The Government consents to the application. Mr. Mendez likewise consents, and consents as well to an exclusion of the adjournment period from calculation under the Speedy Trial Act.

I have submitted through CJA eVoucher a request for authorization of CJA funds to pay for related litigation services, which I hope the Court will grant. Those services will require time to perform, and the amount of time necessary will likely be impacted by the COVID-19 emergency in ways difficult to predict.

Secondly, I was set to commence a trial of one months' duration in New York Supreme Court on March 18, 2020. That trial is still marked ready, but currently adjourned to an unspecified date after May 11, 2020. (*People v. David Safir*, Ind. No. 06641-2018, Kings Cty. Supreme Court, Part 19.) The start date of that trial will be impacted by the court's resumption of trials once the emergency lifts, with priority given to defendants, unlike mine, who are in custody awaiting trial. It is highly likely, in other words, that my state trial will commence at a time that makes the 7/20 start date in Mr. Mendez's case impossible for me.

And lastly, I have not been able to meet with Mr. Mendez for the last month, and do not have any idea when legal visitation will resume.

For all of these reasons, I respectfully request that the trial be adjourned from July 20 to a date in December 2020 or thereafter. The adjournment will permit effective representation by providing time for the related services outlined in my pending application, and will accommodate the other scheduling difficulties set forth above.

Should the Court wish to convene a telephone conference for the parties to discuss the application further, or in the event the Court has additional questions, I am available at any time. I thank the Court for its consideration and assistance.

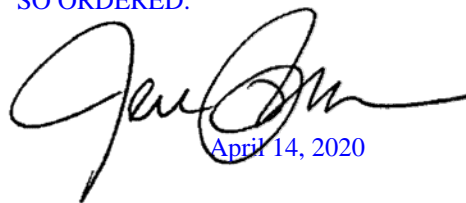
Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Wikstrom".

David Wikstrom

Application GRANTED. Trial is ADJOURNED to November 30, 2020, at 9:30 a.m. The Court excludes time under the Speedy Trial Act, pursuant to Title 18, United States Code, Section 3161(h)(1)(A), from today's date to November 30, 2020, finding that the ends of justice served by such an exclusion outweigh the best interests of the Defendant and the public in a speedy trial because, in light of the unprecedented and extraordinary nature of the COVID-19 emergency, Defendant and his counsel need the time to prepare for trial, to ensure the effective assistance of counsel, and to prevent a miscarriage of justice. The Clerk of Court is directed to terminate ECF No. 16.

SO ORDERED.

A handwritten signature in black ink, likely of the court clerk, with the date "April 14, 2020" written in blue ink below it.

April 14, 2020